

1 The Honorable Ricardo S. Martinez  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 WAYNE SEMINOFF,

11 Plaintiff,

12 v.

13 SUNG HONG, a/k/a LAWRENCE HONG, and  
14 YOUNG HONG, a married couple, HYO  
15 HONG, a single woman, and H & H GROUP,  
16 INC., a Washington corporation,

17 Defendants.

18 NO. CV-06-00149-RSM

19 DECLARATION OF MICHAEL I.  
20 WHITE IN SUPPORT OF YOUNG  
21 RAN KIM'S, F/K/A YOUNG HONG,  
22 MOTION FOR RELIEF FROM  
23 JUDGMENT

24 NOTE ON MOTION CALENDAR:

25 FEBRUARY 11, 2011

1 I, Michael I. White, hereby declare that that I am over the age of 18 years and have  
2 personal knowledge of the matters stated below.

3 1. I am an attorney with Williams, Kastner & Gibbs PLLC, one of the attorneys for  
4 defendant Young Ran Kim, formerly known as Young Hong.

5 2. I contacted plaintiff Wayne Seminoff on January 31, 2011. I asked him if he  
6 would stipulate to an order clarifying that the judgment of June 23, 2009, was against  
7 Mr. Hong only. He declined, stating, "there has to be money changing hands before I agree to  
8 anything."

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11 DECLARATION OF MICHAEL I. WHITE IN SUPPORT OF  
12 YOUNG RAN KIM'S, F/K/A YOUNG HONG, MOTION FOR  
13 RELIEF FROM JUDGMENT - 1  
14 (CV-06-00149-RSM)

15 Williams, Kastner & Gibbs PLLC  
16 601 Union Street, Suite 4100  
17 Seattle, Washington 98101-2380  
18 (206) 628-6600

The foregoing statement is made under penalty of perjury under the laws of the United States of America and the State of Washington and is true and correct.

Signed at Seattle, Washington, this 1st day of February, 2011.

s/Michael I. White

Michael I. White, WSBA #35409  
Attorneys for Defendant Young Ran Kim,  
formerly known as Young Hong  
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DECLARATION OF MICHAEL I. WHITE IN SUPPORT OF  
YOUNG RAN KIM'S, F/K/A YOUNG HONG, MOTION FOR  
RELIEF FROM JUDGMENT - 2  
(CV-06-00149-RSM)

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of February, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and a copy of which was delivered via U.S. Mail to the following:

Wayne Seminoff  
PO Box 956  
Kirkland, WA 98083  
*Plaintiff Pro Se*

DATED this 1st day of February, 2011.

s/Mark S. Davidson  
Mark S. Davidson, WSBA #06430  
Michael I. White, WSBA #35409  
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formerly known as Young Hong  
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DECLARATION OF MICHAEL I. WHITE IN SUPPORT OF  
YOUNG RAN KIM'S, F/K/A YOUNG HONG, MOTION FOR  
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